

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN 12 1997

Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
Access Charge Reform)	CC Docket No. 96-262
)	
Price Cap Performance Review)	CC Docket No. 94-1
for Local Exchange Carriers)	

**OPPOSITION OF AT&T CORP. TO PETITION FOR
PARTIAL STAY OF GTE SERVICE CORPORATION**

Pursuant to Section 1.45(d) of the Commission's Rules, 47 C.F.R. §1.45(d), AT&T Corp. ("AT&T") submits this Opposition to the Petition for Partial Stay filed by GTE Service Corporation on June 9, 1997 ("GTE Petition").

GTE's short Petition essentially repeats the relief sought in the previously filed Joint Petition for Partial Stay of Southwestern Bell, Pacific Bell, and Nevada Bell ("Joint Petition") directed to certain portions of the Commission's First Report and Order (FCC 97-158), released May 16, 1997, in CC Docket Nos. 96-262, et al. ("Access Reform Order"), and the Commission's Fourth Report and Order in CC Docket No. 94-1, and Second Report and Order in CC Docket No. 96-262 (FCC 97-159), released May 21, 1997 ("LEC Price Cap Order").¹

¹ The only relief not sought in the GTE Petition is the Joint Petition's request for stay of that part of the Access Reform Order requiring the price cap LECs to reduce their price cap indices to reflect the completion of the equal access cost amortizations. Evidently, GTE either found no merit to that aspect of the Joint Petition, or believes that portion of the Access Reform Order was inapplicable to it.

In AT&T's Opposition, filed June 9, 1997, we fully discussed the manifest infirmities of the Joint Petition, and pointed out that these stay requests fail to satisfy the basic criteria required to support the granting of stays against these two orders. The points made in the AT&T Opposition to the Joint Petition (which is incorporated herein by reference) are equally applicable to the GTE Petition, which should also be denied by the Commission. Just as in the case of the Joint Petition, GTE has failed to demonstrate that (1) its requested stays would not contravene the public interest, (2) granting the stays would not inflict substantial and irreparable harm on the interexchange carriers and long-distance consumers, (3) without the stays, GTE would suffer irreparable injury, and (4) GTE is likely to succeed on the merits. See AT&T Opposition to Joint Petition at 3-22.²

Besides duplicating the relief requested in the Joint Petition, the GTE Petition (at 2) asks for an additional stay of the following:

"The continuation of sharing obligations incurred during the 1996 access year notwithstanding the required PCI reinitialization using both revised productivity estimates and the CPD figures."

² Attached hereto is the Supplemental Declaration of Joel E. Lubin, Vice President of AT&T, which supplements his Declaration previously submitted in connection with the AT&T Opposition to the Joint Petition. Here Mr. Lubin points out the strong financial position of the GTE companies and that their assumed revenue reductions from lower access charges would not adversely affect GTE's interstate earnings level, which would continue to be well above the Commission's prescribed rate of return for the LECs' interstate services.

Moreover, Mr. Lubin points to facts that belie GTE's claim that current competitive conditions in the access markets would preclude GTE from raising interstate access rates to recover access charges it is now required to forego. As Mr. Lubin shows (Supp. Decl. at ¶4), the GTE operating companies earlier this month made effective access rate increases amounting to over \$150 million on an annual basis.

Although the GTE Petition's request for relief, as stated above, is rather obtuse, some light on its complaint is shed by the GTE Comments in Support of the Joint Petition for Partial Stay, dated June 9, 1997. According to the GTE Comments (at 15-16), it chose the lowest X-Factor alternative (4.0 percent), allowed by the Commission's then-existing price cap rules, when it made its 1996 access filing. The Commission's rules at the time imposed a sharing obligation on those price cap LECs selecting to use the 4 percent X-Factor option in their access filings. As it turned out, the interstate earnings levels of the GTE local carriers were sufficiently high to put them in the sharing range.³ Consequently, the GTE companies face an alleged sharing obligation of \$19.2 million for their overearnings in the 1996 access tariff year. GTE Comments at 16.

GTE's complaint in this regard has nothing at all to do with either order it claims to be appealing. Its sharing obligation for the 1996 access year arose specifically from the requirements adopted in the First Report and Order, CC Docket No. 94-1, 10 FCC Rcd. 8961 (1995) ("1995 LEC Price Cap Order"), aff'd sub nom., Bell Atlantic v. FCC, 79 F.3d. 1195 (D.C. Cir. 1996). The 1995 LEC Price Cap Order gave the price cap LECs three X-Factor options (4.0, 4.7, and 5.3 percent) -- with the two lower options subject to sharing obligations depending on the particular LEC's actual earnings results. It so happened that GTE selected the lowest option for its 1996 interstate access filings, and thus benefited from access rates much higher than those it would have charged if it had chosen a higher X-Factor (including the 5.3 percent alternative that would have exempted it from any sharing

³ According to the Supplemental Declaration of Mr. Lubin, the GTE companies had a combined interstate rate of return of 17.6 percent in 1996.

obligation). GTE's present complaint concerns the provisions of the 1995 LEC Price Cap Order (which were later affirmed by the D.C. Circuit) and the effect of its past judgment in selecting the lowest X-Factor option for its 1996 access filings.

On the other hand, GTE has no dispute in that respect with the 1997 LEC Price Cap Order. Although that Order requires a recomputation of the LECs' PCIs to reflect a revised X-Factor as if that factor had been in effect with the 1996 access year, it operates only prospectively and does not require any past refunds arising from its application of its revised increased X-Factor. The 1997 LEC Price Cap Order does not alter GTE's sharing obligation as to the past. In fact, even if the Commission had kept the same X-Factors that it adopted in 1995 or had even lowered the X-Factor, GTE would have still been subject to the same sharing obligation it now faces because of its past X-Factor choice and the Commission's price cap rules existing at the time. In short, GTE's complaint about its sharing obligation has no relevance whatever to its instant stay petition directed to the Commission's recently adopted orders.


Wherefore, for the reasons stated herein and in the AT&T Opposition to the Joint Petition, the GTE Petition for Partial Stay should be denied.

Respectfully submitted,

AT&T Corp.

By Its Attorneys

Jules M. Perlberg
Gene C. Schaerr
1722 Eye Street, N.W.
Washington D.C. 20006
(202) 736-8141


Mark C. Rosenblum
Peter H. Jacoby
Room 3245G1
295 North Maple Avenue
Basking Ridge, New Jersey 07920
(908) 221-4243

June 12, 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Access Charge Reform)	CC Docket No. 97-262
)	
Price Cap Performance Review)	CC Docket No. 94-1
for Local Exchange Carriers)	

SUPPLEMENTAL DECLARATION OF JOEL E. LUBIN

Joel E. Lubin declares as follows:

1. I am Regulatory Vice President-Law and Public Policy of AT&T Corp. ("AT&T"). On June 9, 1997, I executed a declaration in opposition to the Joint Petition by Pacific Bell, Nevada Bell and Southwestern Bell Telephone Company requesting a partial stay of the Commission's recent orders in the above-captioned proceedings on the ground, in part, that certain portions of those orders will inflict "irreparable injury" on those entities. I make this supplemental declaration in opposition to the petition by GTE Service Corporation ("GTE") also requesting a partial stay of those same Commission orders, which asserts that certain portions of the orders will likewise inflict "irreparable injury" on GTE's affiliated local exchange carriers ("LECs"). I hereby incorporate by reference my June 9, 1997 declaration.

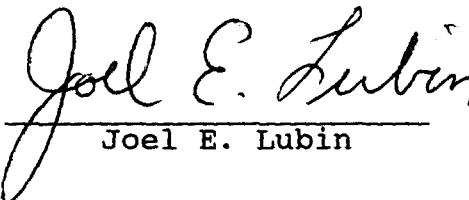
2. Attached as Schedule 1 of this supplemental declaration is a chart including data on annual revenues, expenses, investment and earnings levels for the calendar year 1996 for GTE's interstate services, as reported by the GTE LECs in those carriers' Form 492 reports to the

Commission. As shown there, the GTE LECs in the aggregate achieved an annual rate of return of 17.62 percent, on annual revenues of almost \$3 billion for that year.

3. Schedule 1 also restates the foregoing data for the GTE LECs to reflect the reduction in their interstate access revenues that AT&T estimates will result for GTE from the combined effects of the Commission's orders in these proceedings. As shown in that schedule, even after the revenue reductions the GTE LECs' rate of return would be 14.54 percent. -- still well above the 11.25 percent rate of return prescribed by the Commission for these LEC interstate services.

4. This calculation of the impact of the Commission's orders on the GTE LECs also does not take account of the fact that those carriers have recently increased substantially their interstate access rates, thereby eliminating virtually all of the "headroom" between their price cap indices ("PCIs") and actual price indices ("APIs"). Specifically, effective June 3, the GTE Telephone Operating Companies by Transmittal No. 1096 (filed May 19, 1997) implemented interstate access rate increases of \$136.6 million on an annualized basis. On that same effective date, the GTE System Telephone Companies, which are the former Contel operating companies acquired by GTE, by Transmittal No. 207 (filed May 19, 1997) implemented interstate access rate increases of \$14.4 million on an annualized basis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 12, 1997.


Joel E. Lubin

GTE 1996 FORM 492 REM 492 INTERSTATE RESULTS
(Dollars in thousands)

	NET REVENUE	EXPENSES AND TAXES	NET RETURN	AVERAGE NET INVESTMENT	RATE OF RETURN	RATE OF RETURN@ 11.25%*	EXCESS**
GTE	\$2,968,166	\$2,201,329	\$766,837	\$4,353,071	17.62%	\$489,720	\$277,117

* This amount represents the aggregate earnings which the carriers would have achieved at an 11.25 percent rate of return prescribed by the commission for the LECs' interstate services.

**This amount represents the difference between the actual earnings reported by the carriers and the amount of earnings that would have been achieved at an 11.25 percent rate of return, multiplied by a factor of 1.66667 to account for tax effects (at an assumed composite rate of 40 percent).

GTE 1996 FORM 492 INTERSTATE ADJUSTED RESULTS
(Dollars in thousands)

	REVENUE	1997 ANNUAL FILING IMPACT+	EXPENSES AND TAXES	1997 ANNUAL FILING TAX ADJUSTMENT	NET RETURN	AVERAGE NET INVESTMENT	RATE OF RETURN
GTE	\$2,968,166	(\$223,087)	\$2,201,329	(\$89,235)	\$632,985	\$4,353,071	14.54%

+ This amount represents AT&T's estimate of the combined impact of the annual filing on the GTE Telephone Operating Companies ("GTOCs") and the GTE Telephone System Companies ("GTSCs," the former Contel Companies).

CERTIFICATE OF SERVICE

I, Thomas Waddell, do hereby certify that on this 12th day of June 1997, a copy of the foregoing Opposition of AT&T Corp., together with the attachment, were mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached Service List.



Thomas Waddell

SERVICE LIST

Mary E. Newmeyer
Federal Affairs Advisor
Alabama Public Service Commission
P.O. Box 991
Montgomery, AL 36101

James Rowe
Executive Director
Alaska Telephone Association
4341 B St. - Suite 304
Anchorage, AK 99503

Gerald Depo, President
Alliance for Public Technology
901 15th St., NW - Suite 230
Washington, DC 20005

Carolyn C. Hill
ALLTEL Telephone Services Corporation
655 Fifteenth Street, NW - Suite 220
Washington, DC 20005

Donna Lampert
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo
701 Pennsylvania Ave., NW - Suite 900
Washington, DC 20004

John Rother, Esq.
Director, Legislation & Public Policy
American Association of Retired Persons
601 E. St., NW
Washington, DC 20049

Carol C. Henderson, Executive Director
American Library Association
1301 Pennsylvania Ave., NW - Suite 403
Washington, DC 20004

America's Carriers Telecommunication Association
c/o Charles H. Helein, General Counsel
Helein & Associates, P.C.
8180 Greensboro Drive - Suite 700
McLean, VA 22102

Michael S. Pabian
Ameritech
Rm. 4H82
2000 W. Ameritech Center Dr.
Hoffman Estates, IL 60196-1025

Edward Shakin
1320 North Court House Road - 8th Floor
Arlington, VA 22201
Attorney for Bell Atlantic Telephone
Companies

Joseph Di Bella
1300 I Street, NW - Suite 400 West
Washington, DC 20005
Attorney for NYNEX Telephone Companies

Richard M. Sbaratta
BellSouth Corporation
BellSouth Telecommunications, Inc.
1155 Peachtree St., NE - Suite 1700
Atlanta, GA 30309-3610

Christopher J. Wilson
Frost & Jacobs
2500 PNC Center
201 E. Fifth St.
Cincinnati, OH 45202
Attorney for Cincinnati Bell Telephone Co.

Richard M. Tettelbaum
Associate General Counsel
Citizens Utilities Company
1400 16th St., NW - Suite 500
Washington, DC 20036

Diane Smith
ALLTEL Corporate Services, Inc.
655 15th Street, NW - Suite 220
Washington, DC 20005-5701
Attorney for Independent Telephone &
Telecommunications Alliance

Thomas K. Crowe, P.C.
2300 M St., NW - Suite 800
Washington, DC 20037
Attorney for Commonwealth of the
Northern Marianas Islands

Ronald J. Binz, President
Competition Policy Institute
1156 15th Street, NW - Suite 310
Washington, DC 20005

Randolph J. May
Sutherland, Asbill & Brennan
1275 Pennsylvania Ave., NW
Washington, DC 20004-2404
Attorney for CompuServe Incorporated

Kent Larsen
Cathey, Hutton & Associates
2711 LBJ Freeway, Suite 560
Dallas, TX 75234

Mary Mack Adu.
People of the State of California and
Public Utilities Commission of the
State of California
505 Van Ness Ave.
San Francisco, CA 94102

Henry D. Levine
Levine, Blaszak, Block & Boothby
1300 Connecticut Ave., NW - Suite 500
Washington, DC 20036
Attorney for Bankers Clearinghouse,
Mastercard, and Visa

Ronald L. Plessner
Piper & Marbury L.L.P.
1200 19th St., NW, 7th Floor
Washington, DC 20036
Attorney for Commercial Internet
Exchange Association

Morton Bahr, President
Communications Workers of America
501 Third St., NW
Washington, DC 20001-2797

Genevieve Morelli
Executive V.P. and General Counsel
Competitive Telecommunications Association
1900 M Street, NW - Suite 800
Washington, DC 20036

Danny E. Adams
Kelley Drye & Warren, LLP
1200 19th Street, NW - Suite 500
Washington, DC 20036-2423
Attorney for Competition Policy Institute

Wayne V. Black
Keller and Heckman, LLP
1001 G Street, NW - Suite 500 West
Washington, DC 20001
Attorney for
American Petroleum Institute

Christopher W. Savage
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Ave., NW - Suite 200
Washington, DC 20006
Attorney for
Centennial Cellular Corporation

James Love
Director
Consumer Project On Technology
P.O. Box 19367
Washington, DC 20036

Dana Frix
Swidler & Berlin
3000 K Street, NW - Suite 300
Washington, DC 20007
Attorney for ACC Long Distance, Excel
Telecomm., and Telco Telecomm.

Cynthia B. Miller
Florida Public Service Commission
Gerald Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Michael J. Shortley, III
Frontier Corporation
180 South Clinton Ave.
Rochester, NY 14646

Charles A. Acquard
Executive Director
National Ass'n of State Utility Consumer Advocates
1133 15th Street, NW - Suite 550
Washington, DC 20005

Ronald Dunn, President
Information Industry Association
1625 Massachusetts Ave., NW - Suite 700
Washington, DC 20036

Gary L. Mann, Director, Regulatory Affairs
IXC Long Distance, Inc.
98 San Jacinto - Suite 700
Austin, TX 78701

Gregory Casey
LCI International Telecom Corp.
8180 Greenboro Drive - Suite 800
McLean, VA 22102

Robert A. Mazer
Vinson & Elkins
1455 Pennsylvania Ave., NW
Washington, DC 20004-1008
Attorney for Aliant Communications Co.

Clint Frederick
Frederick & Warriner, LLC
10901 West 84th Terrace - Suite 101
Lenexa, Kansas 66214-1631

Kathy L. Shobert
Director, Federal Affairs
General Communication, Inc.
901 15th St., NW - Suite 900
Washington, DC 20005

Gail L. Polivy 5214
GTE Service Corporation
1850 M St., NW - Suite 1200
Washington, DC 20036

ITCs, Inc.
c/o David A. Irwin
Irwin, Campbell & Tannewald, P.C.
1730 Rhode Island Ave., NW
Washington, DC 20036

Michael S. Fox
Director, Regulatory Affairs
John Staurulakis, Inc.
6315 Seabrook Rd.
Seabrook, MD 20706

Mary Sisak
Senior Regulatory Analyst
MCI Telecommunications Corporation
1801 Pennsylvania Ave., NW
Washington, DC 20006

Joseph S. Paykel
Media Access Project
2000 M St., NW
Washington, DC 20036

James Bradford Ramsay
National Assn. of Regulatory Utility Commissioners
1201 Constitution Ave. - Suite 1102
P.O. Box 684
Washington, DC 20044

Mary E. Burgess
Assistant Counsel
Office of General Counsel
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Edwin N. Lavergne
Ginsburg, Feldman & Bress, Chartered
1250 Connecticut Ave., NW
Washington, DC 20036
Attorney for Interactive Services Association

Stephen G. Kraskin
Kraskin & Lesse
2120 L Street, NW - Suite 520
Washington, DC 20037

Richard Johnson
4800 Northwest Center
90 South Seventh Street
Minneapolis, MN 55402-4129
Attorney for Minnesota Independent
Coalition

Stanley M. Gorinson
Preston, Gates, Ellis & Rouvelas Meeds
1735 New York Ave., NW
Washington, DC 20006
Attorney for Microsoft Corp.

Richard J. Johnson
Moss & Barnett
4800 Norwest Center
90 S. Seventh St.
Minneapolis, MN 55402-4129
Attorney for MN Independent Coalition

Joanne Salvatore Bochis
National Exchange Carrier Association, Inc.
100 South Jefferson Rd.
Whippany, NJ 07981

Robert S. Tongren
Ohio Consumers' Counsel
77 S. High St. - 15th Floor
Columbus, OH 43266-0550

Dr. Norman K. Myers
Ozarks Technical Community College
P.O. Box 5958
Springfield, MO 65801

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Jefferson City, MO 65102
Attorney for the Group of State Consumer
Advocates

Brian Moir
Moir & Hardman
2000 L Street, NW - Suite 512
Washington, DC 20036-4907
Attorney for International Communications
Association

Albert H. Kramer
Dickstein, Shapiro, Morin & Oshinsky, LLP
2101 L Street, NW
Washington, DC 20037-1526
Attorney for ICG Telecom Group, Inc.

Daniel L. Brenner
1724 Massachusetts Ave., NW
Washington, DC 20036
Attorney for the National Cable Television
Association

Office of the Judge Advocate General
U.S. Army Litigation Center
c/o Robert N. Kittel
901 N. Stuart Street - Suite 713
Arlington, VA 22202-1837

Margaret E. Garber
1275 Pennsylvania Ave., NW
Washington, DC 20004
Attorney for Pacific Telesis Group

Mark J. Golden
Vice President - Industry Affairs
Personal Communications Industry Association
500 Montgomery St. - Suite 700
Alexandria, VA 22314-1561

Roger Hamilton, Chairman
Oregon Public Utility Commission
550 Capitol St., NE
Salem, OR 97310-1380

Steven T. Nourse
Assistant Attorney General
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

George Petrutsas
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street - Suite 1100
Rosslyn, VA 22209
Attorney for Roseville Telephone Company

Michael J. Ettner
General Services Administration
18th & F Streets, NW - Room 4002
Washington, DC 20405

David J. Newburger
Newburger & Vossmeier
One Metropolitan Square - Suite 2400
St. Louis, MO 63102

Attorneys for American Association for Adult and Continuing
Education; Association for Gerontology and Human Development at Historically
Black Colleges and Universities; ConnectMissouri; Missouri Center on Minority
Health and Aging; National Association of Commissions for Women;
National Association of Development Organizations; National Farmers Union;
National Hispanic Council on Aging; The National Trust; National Latino
Telecommunications Task Force; Barbara O'Connor, CoConvenor of the
Consumer Summit and Professor of Communications, California State
University, Sacramento; President's Club for Telecommunications Justice;
United Seniors Health Cooperative; United Homeowners Association; Virginia
Public Interest Coalition; and the Universal Service Alliance

Pat Wood, III, Chairman
Public Utility Commission of Texas
7800 Shoal Creek Blvd.
Austin, TX 78757

Lawrence D. Crocker, III
Public Service Commission of the District of
Columbia
717 14th Street, NW
Washington, DC 20005

Joe D. Edge
Drinker Biddle & Reath
901 Fifteenth St., NW
Washington, DC 20005
Attorney for Puerto Rico Telephone
Company

John J. List
Senior Vice President, Member Services
Rural Telephone Finance Cooperative
2201 Cooperative Way
Herndon, VA 20171

Lisa M. Zaina
21 Dupont Circle, NW - Suite 700
Washington, DC 20036
Attorney for Rural Telephone Coalition
(OPASTCO)

Margot Smiley Humphrey
Koteen & Naftalin, LLP
1150 Connecticut Ave., NW - Suite 1000
Washington, DC 20036
Attorney for Rural Telephone Coalition
(NRTA) and TDS Telecomm. Corp.

Pam Nelson
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol St.
Pierre, SD 57501-5070

Robert M. Lynch
One Bell Center - Suite 3520
St. Louis, MO 63101
Attorney for Southwestern Bell Telephone

Randy Zach
TCA, Inc.
3617 Betty Dr. - Suite I
Colorado Springs, CO 80917

Randall B. Lowe
Piper & Marbury, LLP
1200 19th Street, NW
Washington, DC 20036
Attorney for Tele-Communications, Inc.

Laurie Pappas
Deputy Public Counsel
Texas Office of Public Utility Counsel
1701 N. Congress Ave., 9-180
P.O. Box 12397
Austin, TX 78711-2397

David Cosson
2626 Pennsylvania Ave., NW
Washington, DC 20037
Attorney for Rural Telephone Coalition
(NTCA)

Wally Beyer, Administrator
United States Department of Agriculture
14th and Independence Streets
Washington, DC 20250

Anne U. MacClintock
Vice President - Regulatory Affairs & Public Policy
Southern New England Telephone Company
227 Church St.
New Haven, CT 06510

Jay C. Keithley
Sprint Corporation
1850 M St., NW - Suite 1110
Washington, DC 20036

Margot Smiley Humphrey
Koteen & Naftalin, L.L.P.
1150 Connecticut Ave., NW - Suite 1000
Washington, DC 20036
Attorney for TDS Telecommunications
Corporation

J. Manning Lee
Vice President, Regulatory Affairs
Teleport Communications Group, Inc.
Two Teleport Dr. - Suite 300
Staten Island, NY 10311

Brian Conboy
Wilkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036
Attorney for Time Warner

Charles C. Hunter
Hunter & Mow, P.C.
1620 I St., NW - Suite 701
Washington, DC 20006
Attorney for
Telecommunications Resellers Association

Richard A. Finnegan
2405 Evergreen Park Drive, SW - Suite B-1
Olympia, WA 98502
Attorney for Oregon Independent Telephone
Association and Washington Independent

Robert M. Berger
Winstar Communications, Inc.
1146 19th St., NW
Washington, DC 20036

Kathleen Q. Abernathy
Airtouch Communications, Inc.
1818 N St., NW
Washington, DC 20036

Glenn B. Manishin
Blumenfeld & Cohen - Technology Law Group
1615 M Street, NW - Suite 700
Washington, DC 20036
Attorney for Spectranet International, Inc.

Bradley Stillman
MCI Communications Corporation
1801 Pennsylvania Ave., NW
Washington, DC 20006

Scott J. Rubin, Esq.
3 Lost Creek Drive
Selinsgrove, PA 17870-9357
Attorney for Pennsylvania Internet Service
Providers

Robert B. McKenna
1020 19th St., NW
Washington, DC 20036
Attorney for U S West, Inc.

Benjamin H. Dickens, Jr.
Blooston, Modkofsky, Jackson & Dickens
2120 L Street, NW - Suite 300
Washington, DC 20037
Attorney for the Western Alliance

Richard S. Whitt
Worldcom, Inc.
1120 Connecticut Ave., NW - Suite 400
Washington, DC 20036

Jeffrey F. Beck
Beck & Ackerman
Four Embarcadero Center - Suite 760
San Francisco, CA 94111
Attorney for Small Western LECs

Colleen Boothby
Levine Blaszak Block & Boothby
1300 Connecticut Ave., NW - Suite 500
Washington, DC 20036-1703
Attorney for Internet Access Coalition and
Ad Hoc Telecomm. Users Committee

Mary McDermott
1401 H Street, NW - Suite 600
Washington, DC 20005
Attorney for the United States Telephone
Association

W. Fred Seigneur, President
SONETECH, Inc.
109 Kale Ave.
Sterling, VA 20164

Kenneth T. Burchett, Vice President
GVNW Inc.
P.O. Box 230399
Portland, Oregon 97281-0399

Reginald R. Bernard, President
SDN Users Association, Inc
P.O. Box 4014
Bridgewater, NJ 08807

Steven G. Sanders, President
Northern Arkansas Telephone Company, Inc.
301 East Main Street
Flippin, AR 72634

Gerald Depo, President
Alliance for Public Technology
901 15th Street, NW
Washington, DC 20005

Wayne Leighton, PhD
Senior Economist
Citizens for a Sound Economy Foundation
1250 H Street, NW - Suite 700
Washington, DC 20005

Lyman C. Welch
190 S. LaSalle St. - #3100
Chicago, IL 60603

Penny Baker
Deputy General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Christopher Klein, Chief
Utility Rate Division
Tennessee Regulatory Staff
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Jon Radoff
1630 Worcester Road #421
Framingham, MA 01701

Myra L. Karegianes
General Counsel
Illinois Commerce Commission
160 N. LaSalle St. - Suite C-800
Chicago, IL 60601

Curtis T. White
Managing Partner
Allied Associated Partners, LP
4201 Connecticut Ave., NW - Suite 402
Washington, DC 20008-1158

Eva Powers
Assistant Attorney General
Kansas Corporation Commission
1500 Southwest Arrowhead Rd.
Topeka, Kansas 66604

James S. Blaszk
Gardner, Carton & Douglas
Suite 900 - East Tower
1301 K Street, NW
Washington, DC 20005

Edward Chen
American Reliance Inc.
11801 Goldring Road
Arcadia, CA 91006

Dr. Lee L. Selwyn
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02018

Charles W. Trippe
AmPro Corporation
525 John Rodes Blvd.
Melbourne, FL 32934

John C. Smith
Aeronautical Radio, Inc.
2551 Riva Road
Annapolis, MD 21401

Heather Burnett Gold
Association for Local
Telecommunications Services
1200 19th Street, NW - Suite 607
Washington, DC 20036

James E. Kieth
Ambox Inc.
6040 Telephone Road
Houston, TX 77087

W. Theodore Pierson, Jr.
Pierson & Tuttle
1200 19th Street, NW - Suite 607
Washington, DC 20036

Paul Pandian
Axes Technologies
3333 Earhart
Carrollton, TX 75006

Gary M. Epstein
Latham & Watkins
1001 Pennsylvania Ave., NW
Suite 1300
Washington, DC 20004-2505

Dr. James R. Ellig
Center for Market Processes
4084 University Drive, Suite 208
Fairfax, VA 22030

Janice Obuchowski
Halprin, Temple & Goodman
1100 New York Avenue, NW
Suite 650 East
Washington, DC 20005

Alan J. Gardner
California Cable Television Association
4341 Piedmont Ave.
Oakland, CA 94611

Allan J. Arlow
Computer & Communications Industry Association
666 11th Street, NW
Washington, DC 20006

Terry L. Murray
Murray & Associates
101 California Street, Suite 4225
San Francisco, CA 94111

Charles A. Zielinski
Rogers & Wells
607 14th Street, NW
Washington, DC 20005

George Sollman
Centigram Comm. Corp.
91 East Tasman Drive
San Jose, CA 95134

Werner K. Hartenberger
Laura H. Phillips
Dow, Lohnes & Albertson
1255 23rd Street, NW - Suite 500
Washington, DC 20037

Lucille M. Moore
Intellect, Inc.
1100 Executive Drive
Richardson, TX 75081

Emily Hewitt
General Services Administration
18th & F Streets, NW - Room 4002
Washington, DC 20405

Brian R. Moir
Moir & Hardman
2000 L St., NW - Suite 512
Washington, DC 20036

Joseph A. Lahoud
LC Technologies, Inc.
9455 Silver King Court
Fairfax, VA 22031

John E. Lingo, Jr.
Lingo, Inc.
PO Box 1237
Camden, NJ 08105

Stephen B. Kaufman
HealthTech Services Corp.
255 Revere Drive - Suite 101
Northbrook, IL 60062

Leonard J. Kennedy
Dow, Lohnes & Albertson
1255 23rd St., NW - Suite 400
Washington, DC 20037

James B. Wood
Inovonics, Inc.
1305 Fair Avenue
Santa Cruz, CA 95060

Aliceann Wohlbruck
National Association of Development
Organizations
444 North Capitol Street, NW - Suite 630
Washington, DC 20001

Lisa M. Zaina
Organization for the Protection and Advancement
of Small Telephone Companies
21 Dupont Circle, NW - Suite 700
Washington, DC 20036

James P. Tuthill
Pacific Bell/Nevada Bell
140 New Montgomery Street - Room 1530-A
San Francisco, CA 94105

James L. Wurtz
Pacific Bell/Nevada Bell
1275 Pennsylvania Ave., NW
Washington, DC 2004

Stephen L. Goodman
Halprin, Temple & Goodman
1100 New York Ave., NW
Suite 650 East
Washington, DC 20005

Brian D. Thomas
Pacific Telecom, Inc.
805 Broadway
Vancouver, WA

Edward R. Wholl
NYNEX
1111 Westchester Ave.
White Plains, NY 10604

Irwin A. Popowsky
State of PA
Office of Attorney general
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Frank Tripi
Perception technology Group
40 Shawmut Road
Canton, MA 02021

L. Paul Knoerzer
OK Champion Corporation
PO Box 585
Hammond, IN 46325

J.R. Panholzer
Remarque Mfg. Corp.
110 Field Street
West Babylon, NY 11704

Al W. Wokas
Rhetorex, Inc.
200 E. Hacienda Ave.
Campbell, CA 95008

David L. Deming
Senecom Voice Processing Systems
317 North 11th Street - Suite 200
St. Louis, MO 63101

Fred Van Veen
Teradyne, Inc.
321 Harrison Avenue
Boston, MA 02118

Paul B. Jones
Time Warner Communications
300 First Stamford Place
Stamford, CT 06902-6732

Susan M. Baldwin
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

David R. Poe
LeBoeuf, Lamb, Greene & MacRae
1875 Connecticut Ave., NW
Suite 1200
Washington, DC 20009-5728

Jay C. Keithley
United & Central Telephone Companies
1850 M. Street, NW
11th Floor
Washington, DC 20036

W. Richard Morris
United & Central Telephone Companies
PO Box 11315
Kansas City, MO 64112

Lawrence P. Keller
Cathey, Hutton & Assoc., Inc.
3300 Holcomb Bridge Road
Suite 286
Norcross, GA 30092

James T. Hannon
US WEST Communications, Inc.
1020 19th Street, NW
Suite 700
Washington, DC 20036

Peter A. Rohrbach
Hogan & Hartson
Columbia Square
555 13th Street, NW
Washington, DC 20004-1109

Joseph Miller
WilTel, Inc.
PO Box 21348
Tulsa, OK 74121

R. Michael Senkowski
Robert J. Butler
Clifford M. Sloan
Wiley, Rein & Fielding
1776 K Street, N. W.
Washington, D.C. 20006